United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report

Case Number
0700-0469

Case Title:
Jacam Chemicals LLC

Reporting Office:
Kansas City, KS, Area Office

Subject of Report:
Report of Interview with KCC District #2 Supervisor (b) (6), (b) (7)(C) by SA (b) (6), (b) (7)(C)

Activity Date:
October 1, 2013

Reporting Official and Date:
(b) (6), (b) (7)(C)
Special Agent
02-OCT-2013, Signed by: (b) (6), (b) (7)

Approving Official and Date:
(b) (6), (b) (7)(C)
Special Agent in Charge
04-OCT-2013, Approved by: [redacted]

SYNOPSIS

SA (b) (6), (b) (7)(C) interviewed Kansas Corporation Commission (KCC) District #2 Supervisor (b) (6) about the class #2 injection well which is operated by the KCC and a conversation (b) (6) had with (b) (6), (b) (7)(C) about maintenance of class #2 injection wells. (b) (6), (b) (7)(C) indicated that the KCC injection well in (b) (6) district has been chemically treated twice in twelve years to help it accept waste water. (b) (6), (b) (7)(C) said if (b) had to chemically treat an injection well more than once a year (b) would have to make a determination if it was actually economically viable to use the well. In (b) (6), (b) (7)(C) conversation with (b) (6), (b) (7)(C) told (b) (6) that on the injection wells (b) operated there was no routine maintenance for chemical treatments and that it may have to be done every two to three years to clear out iron sulfide deposits in the tube.

DETAILS

On September 17, 2013, SA (b) (6), (b) (7)(C) spoke with Kansas Corporation Commission Region 2 Supervisor (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) is the supervisor responsible for the area where the Matlock #2 injection well is located to the north of Hutchinson, Kansas. SA (b) (6), (b) (7)(C) asked (b) (6) (b) to contact a class #2 injection well operator in (b) (6) region and asked the operator about routine maintenance and expenses associated with the operation of a class #2 injection well.

(b) (6), (b) (7)(C) agreed and on September 20, 2013, (b) (6) made contact with (b) (6), (b) (7)(C). (b) (6) (b) (6), (b) (7)(C) is an attorney and operates class #2 injection wells in the area. (b) (6), (b) (7)(C) typed a list of questions for (b) (6), (b) (7)(C) and took notes on it during their conversation. The questions asked by (b) (6), (b) (7)(C) included the maintenance schedule for injection wells, specific methods of treatment, invoicing and billing for maintenance services. SA (b) (6), (b) (7)(C) attached a copy of the questions and handwritten answers by (b) (6), (b) (7)(C) to this report. (b) (6), (b) (7)(C) indicated that (b) does operate class #2 injection wells which dispose of waste water into the Arbuckle geological formation. (b) (6) [redacted] indicated that there was no routine maintenance schedule for the chemical treatment of (b) (6) (b) class #2 injection wells. (b) (6) said the last maintenance done on the well was three or four years ago during a permit required mechanical integrity test. The test found that (b) (6) needed to replace three or four joints in the tubing.

(b) (6), (b) (7)(C) said the primary problem which would require a chemical treatment would be the buildup of iron sulfide inside the well which in (b) (6) experience may take two to three years to form. The operator knows it is time treat the well when they see high levels of fluid in the salt water tank. This indicates that the well is not accepting waste water as fast as it should. When a chemical treatment is needed it would consist of 200 to 300 hundred gallons of hydrochloric acid in a 28%

solution which was gravity feed into the well. The treatment takes about and hour and is billed by the servicing company via an invoice which is mailed to [redacted]. The service company used by [redacted] was Copeland Acid and Cementing from Hays, Kansas.

On October 1, 2013, SA [redacted] conducted a telephonic interview with [redacted] about [redacted] conversation with [redacted] and a class #2 injection well which is operated by the KCC.

[redacted] said that the KCC has operated class #2 injection wells since prior to [redacted] employment in 2001. The injection well in [redacted] region is used to dispose of waste water related to ground water contamination from historical mineral extraction activities in the area. The disposal well is used everyday and is permitted by the KCC.

[redacted] indicated during the last twelve years, the KCC has performed chemical treatments twice on the injection well in order to help it better accept waste water. The chemical treatments involved the injection of a 1000 gallons of a 15% solution of hydrochloric acid was completed by Reef Incorporated which has since changed its name to Maxidize. Maxidize is owned by [redacted]. The well operators believed it needed maintenance because they noticed it was not accepting waste water as well as in the past. The second time the injection well was treated was because it was out of service anyway for other maintenance needs. The most recent treatment costed $2490 and was completed on December 7, 2012. [redacted] agreed to provide a copy of the invoice which is attached to this report.

[redacted] indicated that the class #2 injection wells do not require routine acid treatments to continue to operate and that regular acid treatments would be cost prohibitive. [redacted] said that if [redacted] needed to treat an injection well more than once a year [redacted] would be concerned about the financial viability of using the well for disposal.

[redacted] said the injection well that the KCC operates is an "open hole" into the Arbuckle formation. The other type of well is "perforated" and it may require acid treatments once a year.

ATTACHMENT

Maxidize Invoice to KCC for chemical treatment
[redacted] questions and hand written notes